

# H.M. WALKER & ASSOCIATES, Inc.

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August 28, 1995

Hercules Marine Services Corp.  
Attn: Mr. Larry Ballinger  
P.O. Box Drawer O  
Freeport, Texas 77541

Dear Larry:

Attached are copies of the text of the proposed Coast Guard regulations which I obtained from Platzer.

I have marked passages which merit your attention. I am sure that many changes will be made before ~~this~~ becomes final. Hercules and the rest of the industry should protest strenuously anything which will cause significant operating, economic, or safety problems.

I am concerned with the following:

- 1) Any requirement which precludes the use of large light flexible hoses to remove vapors from the bottom of the tanks.
- 2) A requirement for a hard connection between the tank and the vapor collection line (except a ground wire).
- 3) A requirement for turnovers beyond that required to achieve a safe concentration below the flammable level.
- 4) Too many mandatory procedures, valves, analyzers and instruments.

Sincerely,



Harry M. Walker, Ph.D.  
Environmental Consultant

atmospheric chemistry • modeling • permits • regulations • agency liaison

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